## IN THE EXECUTIVE ETHICS COMMISSION OF THE STATE OF ILLINOIS

| IN RE: DANIEL GRANT | ) | No. 13-EEC-014 |
|---------------------|---|----------------|
|                     | ) |                |
|                     | ) | Appeal of OEIG |
|                     | ) | Revolving Door |
|                     | ) | Determination  |
|                     |   |                |

## **DECISION**

This cause is before the Executive Ethics Commission ("Commission") on appeal by the Office of the Attorney General from a determination by the Office of the Executive Inspector General for Agencies of the Illinois Governor.

The record of proceedings has been reviewed by the members of the Executive Ethics Commission. The record consists of the Office of the Executive Inspector General for Agencies of the Illinois Governor's February 15, 2013 determination, the Attorney General's February 25, 2013 Brief in Support of Appeal, the March 1, 2013 Response by Daniel Grant, and the Office of the Executive Inspector General for Agencies of the Illinois Governor's March 1, 2013 Comment to Appeal of Revolving Door Determination.

Respondent intends to receive compensation as an independent contractor with Hinshaw Consulting.

The Commission finds that respondent was not personally and substantially involved in decisions to license or regulate Hinshaw Consulting in the year prior to his termination of State employment.

The record, however, is incomplete, in that it does not identify clients with whom he will be working and therefore renders it impossible to evaluate the issue of an independent contractor possibly receiving compensation, albeit indirectly, from a client that he regulated in the year prior to his termination of State employment.

WHEREFORE, for the foregoing reasons, the Commission denies the Office of the Attorney General's appeal and affirms the OEIG's February 15, 2013 determination. Respondent is free to affiliate himself with Hinshaw Consulting. This decision does not, however, address respondent's ability personally to serve clients that he may have regulated in the year prior to his termination of State employment. If respondent intends to work for clients he regulated, he should notify the OEIG or risk violating the revolving door prohibition.

ENTERED: March 7, 2013

SO ORDERED.

The Executive Ethics Commission

By:

Chad D. Fornoff
Executive Director